

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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J.R.J. ENTERPRISES, INC.,

Plaintiff,

-against-

M/V CAP ORTEGAL, her engines, boilers,  
etc., and COMPANIA SUD AMERICANA  
DE VAPORES, S.A.,

Defendants.

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PLEASE TAKE NOTICE, that upon the annexed Declaration and the exhibits thereto attached, Memorandum of Law, and all the prior pleadings and proceedings in this action, defendant COMPANIA SUD AMERICANA DE VAPORES, S.A. (CSAV) will move the Court before the Honorable Loretta A. Preska, at the Courthouse located at 500 Pearl Street, New York, New York, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment in favor CSAV on all claims, as well as such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
June 26, 2008

MAHONEY & KEANE, LLP  
Attorneys for Defendant  
COMPANIA SUD AMERICANA DE  
VAPORES S.A.

By: 

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